

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CHAD STANBRO,

Plaintiff,

-against-

WESTCHESTER COUNTY HEALTH  
CARE CORPORATION, WESTCHESTER  
MEDICAL CENTER, FRANK WEBER and  
JOHN FULL,

7:19-cv-10857-KMK

Defendants.

-----X

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CHAD STANBRO,

Plaintiff,

-against-

CORRECTION OFFICER NADYA PALOU,  
CORRECTION OFFICER RAYMOND DEAL,  
CORRECTION OFFICER KRISTOFER LEONARDO,  
CORRECTION OFFICER RICHARD LANDRY,  
CORRECTION NURSE GARY PAGLIARO and  
CORRECTION SERGEANT ENRIQUE TORRES,

7:20-cv-01591-KMK

Defendants.

-----X

**BRIEF OF DEFENDANTS DEAL AND PALOU IN  
RESPONSE TO AND JOINING OAG DEFENDANTS' MOTIONS IN LIMINE  
(EF-140 in Case No. 20-cv-1591 – Deal Action)**

Defendants Deal and Palou submit this brief in response to and joining in the OAG defendants Leonardo, Landry, Pagliaro and Torres motion' in limine (EF-140). The motion should be granted in its entirety, and should encompass defendants Deal and Palou, who are similarly situated to the moving defendants.

We understand that the items and topics in the motion are sought to be precluded for any purpose, including other defendants, but we expressly say that we do not disagree with any of the arguments, or the relief sought. Furthermore, the OAG defendants' motion is entirely consistent with the motion in limine of defendants Deal and Palou (EF-136).

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NEW JERSEY OFFICE***

**PROOF OF SERVICE**

On June 13, 2022, I served the within Opposition to Plaintiff's Motion in Limine on counsel for all parties on the Service List below via ECF.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 13, 2022

Mark F. Heinze  
Mark F. Heinze

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